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LAW OFFICES OF

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October 19, 1990

TELEFAX 938-3360

Mr. William K. Riley, Administrator
401 M Street Southwest
U.S. Environmental Protection Agency
Washington, D.C. 20460

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Dear Administrator Riley:

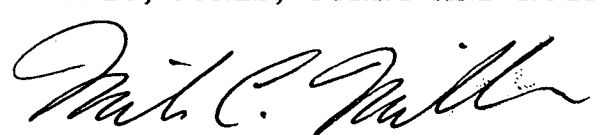
As an environmentalist and an active member of the Environmental Defense Fund, I strongly urge that you deny Ethyl Corporation's application for approval of "HiTec 3000," a toxic manganese-based gasoline additive. It is my understanding that it is beyond dispute that manganese, at high doses, is a well known human neurotoxin. It has persistent and irreversible pathological effects on brain structure and can result in severe impairments of movement and mental state. While I understand it is Ethyl's position that these adverse health effects occur only at high doses, the cumulative effect of millions of automobiles producing small doses cannot be ignored.

I think it is significant that in 1925, the Ethyl Corporation was the first oil company to introduce lead as a gasoline additive. In fact, in 1925, Ethyl argued that the amounts of lead to be added to gasoline at that time were negligible and that lead was only toxic in higher doses. Of course, we now know that lead produced by automobile exhaust was highly toxic and harmful to the environment.

I think it is critical that the Environmental Protection Agency deny Ethyl Corporation's application for this manganese additive.

Sincerely,

JONES, JONES, CURRY AND ROTH


Mike C. Miller

MCM/ac

cc: Senator Lloyd Bentsen, Jr.
United States Senate
Senate Office Building
Washington, D.C. 20510

Congressman Jim Chapman
United States House of Representatives
House Office Building
Washington, D.C. 20515